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November 18, 2022

The Honorable Catherine C. Blake
US Courthouse
101 West Lombard Street
Baltimore, Maryland 21201

Re: Grimaldi Deepsea SpA v. Gabriel Busillo, et al.
Civil Action No.: 22-1343

Dear Judge Blake:

This will provide the parties' joint status report as directed by Your Honor's Order dated November 4, 2022.

As a preliminary matter, Plaintiff Grimaldi would like to make the Court aware that it is finalizing arrangements to secure new Maryland counsel to represent its interests in this case. It is anticipated that effort will be complete within the next thirty (30) days.

Furthermore, Defendant Ports America Chesapeake ("PAC") is a party in a related state court suit filed by Gabriel Busillo against it to which PAC anticipates filing a Third-Party Complaint to add Grimaldi as a party thereto. Grimaldi anticipates the filing of a vigorous opposition to any effort to bring it into the state court suit, particularly considering Mr. Busillo makes no claim of negligence against Grimaldi and Grimaldi chose this forum, as is its right under applicable law and the agreements between Grimaldi and PAC, to resolve any issues that may exist between them. In light of the recent voluntary dismissal of Gabriel Busillo from this Declaratory Judgment action, PAC believes that this matter should be stayed pending the administration of the state court litigation. Plaintiff Grimaldi, however, disagrees that this matter should be stayed if PAC attempts to bring it into the state court suit.

Regardless of the above disagreement as to this administration of this matter, based on the anticipated substitution of Maryland counsel for Plaintiff Grimaldi, and based on the complexity of the issues involved in this matter, including the fact that Defendant PAC is a party in the related state court suit filed by Gabriel Busillo, the parties request a one hundred and twenty day extension of all of the proposed future deadlines. The parties propose the following revised schedule:

The Honorable Catherine C. Blake

November 18, 2022

Page 2

April 24 2023:	Moving for joinder of additional parties and amendment of pleadings
May 5, 2023:	Plaintiff's Rule 26(a)(2) disclosures
June 2, 2023:	Defendant's Rule 26(a)(2) disclosures
June 16, 2023:	Plaintiff's rebuttal Rule 26(a)(2) disclosures
June 23, 2023:	Rule 26(e)(2) supplementation of disclosures and responses
July 21, 2023:	Discovery deadline; submission of status report
July 28, 2023:	Requests for admission
August 18, 2023:	Dispositive pretrial motions deadline

With respect to any potential settlement conference, the parties agree that this should occur following the completion of discovery.

With respect to discovery of electronically stored information, the parties do not believe this will be a substantial part of anticipated discovery activities.

With respect to expert discovery, the parties believe that such discovery should be completed after summary judgment motions are resolved.

With respect to proceeding before a Magistrate Judge, there is not unanimous consent at this time to proceed in that fashion.

Finally, the parties respectfully request that Your Honor set the initial scheduling call in this matter for a date no sooner than 30 days from the date of this correspondence to allow new Maryland counsel for Grimaldi to enter their appearance and get up to speed.

The parties thank the Court for its attention to these issues.

Very truly yours,

/s/

Charles L. Simmons Jr.
Partner

CLS:sjcl